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5 Counsel for Defendant ROBERT DOYLE

6 IN THE UNITED STATES DISTRICT COURT

7 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,)
10) No. CR 14 - 0092 JST
11 Plaintiff,)
12 v.) STIPULATION AND [PROPOSED]
13) ORDER CONTINUING CHANGE OF
14) PLEA DATE; EXCLUSION OF TIME
15)
15 ROBERT THOMAS DOYLE,)
16)
16 Defendant.)
17

17 **STIPULATION**

18 IT IS HEREBY STIPULATED, by and between the parties to this action, that the change of
19 plea date for defendant Robert Doyle, currently scheduled for December 12, 2014 at 9:30 a.m., may
20 be continued to February 6, 2015, at 9:30 a.m. for change of plea. The parties are continuing to meet
21 and confer however additional information has surfaced through witness interviews which may affect
22 the resolution of this case. The government has provided discovery, however, defense counsel needs
23 additional time to investigate the new information and the parties have not yet come to a resolution.

24 IT IS FURTHER STIPULATED THAT the time to February 6, 2015, should be excluded in
25 accordance with the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(1)(A) and (h)(7)(B)(iv) for effective
26 preparation taking into consideration due diligence to enable defense counsel to investigation the

1 new information, review discovery and agree upon a resolution prior to the change of plea date.

2 DATED: 12/09/14

/s/
JOYCE LEAVITT
Assistant Federal Public Defender

3 DATED: 12/09/14

/s/
THOMAS MOORE
Assistant United States Attorney

4
5 I hereby attest that I have permission of the parties to enter a conformed signature (/s/) for all
signatures within this e-filed document.
6

7
8 **ORDER**

9
10 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the change of plea date for
defendant Robert Doyle, may be continued to February 6, 2015, at 9:30 a.m. for change of plea.
11

12 IT IS FURTHER ORDERED THAT the time from December 12, 2014, to February 6, 2015,
13 should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§
14 3161(h)(1)(A) and (h)(7)(B)(iv) for effective preparation of counsel taking into consideration due
15 diligence to enable the defense to investigate the new information and continue reviewing the
16 discovery and allow the parties to resolve the case prior to the change of plea. The Court finds there
17 is good cause and that the ends of justice served by the granting of the continuance outweigh the
18 interests of the public and defendant in a speedy and public trial. Failure to grant the requested
19 continuance would unreasonably deny counsel reasonable time necessary for effective preparation,
20 taking into account due diligence.
21

22 SO ORDERED.
23

24 DATED: December 10, 2014
25

26
U S v. Doyle CR 14-0092 JST; Stip re:
Change of plea date; Exclusion of Time

